

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ENCOMPASS INSURANCE COMPANY OF
MASSACHUSETTS,

Plaintiff,

vs.

JOSEPH D. GIAMPA, FREDERICK T. GIAMPA,
ADVANCED SPINE CENTERS, INC. d/b/a FIRST
SPINE REHAB, FUTURE MANAGEMENT
CORPORATION, EDWARD KENNEDY, BRIAN J.
CULLINEY and JENNIFER McCONNELL

Defendants.

CIVIL ACTION NO.: 05-11693RCL

**JOINT MOTION TO EXTEND TIME TO FILE A RESPONSIVE
PLEADING TO PLAINTIFF'S SECOND AMENDED COMPLAINT.**

Now come the plaintiff, Encompass Insurance Company of Massachusetts,
and the defendants Joseph D. Giampa, Frederick T. Giampa, Advanced Spine Centers, Inc.
D/b/a First Spine Rehab, Future Management Corporation, Future Management Business Trust,
Edward Kennedy, Brian J. Culliney, D.C., and Jennifer McConnell, D.C., and hereby move this
Honorable Court to extend the time to file a responsive pleading to plaintiff's Second Amended
Complaint by 30 days, to August 25, 2006.

Respectfully Submitted
Encompass Insurance Company
By their Attorneys,

Respectfully Submitted
*Joseph D. Giampa, Frederick T. Giampa,
Advanced Spine Centers, Inc. d/b/a First Spine,
and Future Management Corporation*
By their Attorneys,

/s/ Richard D. King(DT)
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/s/ Mathew J. Conroy(DT)
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(781) 862-8060

Respectfully Submitted
Brian Culliney and Jennifer McConnell
By their Attorneys,

Respectfully Submitted
Edward Kennedy
By his Attorneys,

/s/ Thomas M. Ciampa(DT)
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/s/ Daniel Treger
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing. (NEF), and paper copies will be sent to those indicated as non-registered participants on this day, July 24, 2006.

/s/ Daniel Treger